

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Eric Powell	:	Case No. 20-11347
Debtor	:	Chapter No. 13
	:	
Rushmore Mortgage	:	
Movant	:	

DEBTOR'S RESPONSE TO CERTIFICATION OF DEFAULT

Debtor, Eric Powell, by and through his attorneys, Jeanne Marie Cella and Associates, LLC, responds to Rushmore Mortgage's ("Movant's") Certification of Default and respectfully represents the following:

1. Contrary to Rushmore Mortgage's assertion that the debtor failed to comply with the terms of the Stipulation, debtor has, in fact complied as follows:

Debtor submitted a payment of \$900.00 on 7/3/24; debtor has scheduled payments of \$900.00 on 7/10/24 and 7/24/24.
2. Counsel for Rushmore Mortgage intends to verify that all payments were made and, if so, will withdraw the Certification of Default.

WHEREFORE, the debtor respectfully requests that this Honorable Court not enter an Order on the Certification of Default in order to give Rushmore an opportunity to verify payments.

Respectfully Submitted,
Jeanne Marie Cella and Associates, LLC

/s/ Jeanne Marie Cella, Esq

Jeanne Marie Cella, Esq.
Attorney for Debtor
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Dated: July 9, 2024

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